



**Natalie J. Kraner**  
Partner

One Lowenstein Drive  
Roseland, New Jersey 07068

T: (973) 422-6722  
F: (973) 422-6723  
E: nkraner@lowenstein.com

August 13, 2024

**VIA ECF**

The Honorable Michael A. Shipp, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08068

**Re: *B.Y.C.C. v. United States*, No. 22-cv-06586 (MAS)  
*J.A.L.C. v. United States*, No. 22-cv-06587 (MAS)  
*R.J.P. v. United States*, No. 22-cv-06588 (MAS)  
Joint Request to Extend 60-Day Administrative Termination Another 60 Days to  
October 11, 2024**

Dear Judge Shipp:

This firm is pro bono counsel to Plaintiffs in the above referenced matters. On April 15, 2024, this Court issued 60-day orders in all three actions, administratively terminating the cases without prejudice while the parties worked towards consummating the settlements. On June 14, 2024, this Court extended the deadline to August 13, 2024 to allow the parties additional time to finalize the settlements, which involved multiple steps (including motions to approve the minors' settlements) and levels of review.

The Parties have made significant progress in finalizing the settlements. Following a hearing on July 17, 2024, this Court entered an order in the *B.Y.C.C.* and *J.A.L.C.* matters approving the minors' settlements. On August 12, 2024, Defendant United States informed Plaintiffs that the Stipulations of Settlement for all three matters successfully made it through the first, but not final, levels of required approval.

With Defendant's consent, Plaintiffs respectfully request that this Court extend the 60-day administrative termination period for another 60 days. This additional time will afford the Defendant the opportunity to obtain the final approvals of the Stipulations of Settlement and to pay the settlement amounts before the Court dismisses these actions.

Should the Court require any additional information or have any questions, please do not hesitate to contact us. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Catherine Weiss  
Catherine Weiss  
Pro bono Counsel for  
*J.A.L.C. Plaintiffs*

/s/ Natalie J. Kraner  
Natalie J. Kraner  
Pro Bono Counsel for  
*B.Y.C.C. Plaintiffs*

/s/ Jennifer Fiorica Delgado  
Jennifer Fiorica Delgado  
Pro Bono Counsel for  
*R.J.P. Plaintiffs*